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Submitted by Federal eRulemaking Portal:

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Richard M. Brennan  
Senior Regulatory Officer  
Wage and Hour Division  
Employment Standards Administration  
U.S. Department of Labor  
200 Constitution Avenue, N.W., Room S-3502 Washington, D.C. 20210

Re: The Family and Medical Leave Act of 1993  
29 CFR Part 825  
RIN 1215-AB35

Dear Mr. Brennan:

The Family and Medical Leave Act has been a major benefit to America's families and businesses. It has given millions of American workers the basic right to take time off for their own health or when their families needed them most. Adoption of the Act was followed by eight years of strong economic growth and the continued expansion of women's participation in the workforce. FMLA has been a major success.

It is time to expand FMLA rights to workers in smaller companies and to provide a mechanism for workers to receive pay while out on family and medical leave. Here in Washington state, the Family Leave Coalition has been working on those twin goals. In the process, we have heard from hundreds of workers who have struggled to balance work and family responsibilities. Workers, children, families, and businesses have suffered because of the lack of paid family leave.

Therefore, we applaud expansions of rights for military families. We encourage DOL to define servicemember and next of kin broadly; to follow current FMLA requirements for giving notice; to keep medical certification simple; and make leave available on a per servicemember, per injury basis.

We strongly oppose proposed changes to restrict rights under the FMLA and impose additional requirements that make it more difficult for workers to access needed leave. In particular, we oppose proposed changes to the rules on:

- substitution of paid leave
- notification to employers
- medical certification, including those that would require more frequent doctor visits and give employers direct access to employees' medical records.

We urge the DOL to move quickly to complete rulemaking on expansion to military families and to strongly enforce the current law.

Thank you.

Sincerely,

John R. Burbank, Executive Director  
Economic Opportunity Institute

Marilyn P. Watkins, Chair  
Washington State Family Leave Coalition

**Washington State Family Leave Coalition Member Organizations**

AARP of Washington  
Aerospace Machinists District Lodge 751, IAM&AW  
Amalgamated Transit Union Legislative Council  
Amalgamated Transit Union Local 1015  
American Academy of Pediatrics, Washington Chapter  
American Federation of State, County, and Municipal Employees, Council 2  
American Federation of Teachers Washington  
American Association of University Women, Washington Chapter  
Children's Alliance  
Children's Home Society of Washington  
Communication Workers of America  
Economic Opportunity Institute  
Hallmark Services  
International Union of Operating Engineers Local 302  
League of Women Voters of Washington  
Lutheran Public Policy Office  
National Organization for Women, Washington Chapter  
National Partnership for Women and Families  
Northwest Women's Law Center  
Senior Lobby  
Service Employees International Union 925  
Take Back Your Time  
United Food and Commercial Workers  
United Food and Commercial Workers Local 141  
Washington Association for the Education of Young Children  
Washington Association of Churches  
Washington Citizen Action  
Washington State Alliance for Retired Americans  
Washington State Building and Construction Trades Council  
Washington State Labor Council  
Working American, AFL-CIO